

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

CASE NO: 12-08766-BKT/C

IN RE:

CHAPTER: 13

**SILVA. SERRANO, JUAN AVELINO
(SS: 8166)**

(SS:)

Debtor(s)

**URB. VILLA CONTESA
CALLE KENT N-26
BAYAMON, PR 00956**

OPPOSITION TO TRUSTEE'S OBJECTION TO EXEMPTIONS

TO THE HONORABLE COURT:

COME(S) NOW Debtor(s), represented by the undersigned attorney, and represent(s) as follows:

1. On Docket #50, the Chapter 13 Trustee filed a motion objecting the exemptions claimed by debtor(s) for real and personal property. We oppose to trustee's objection to exemptions.
2. The Trustee based her objection to the exemption of real property disclosed on Schedule A based on the fact that the Property Registry of Bayamon notified a defect in the notary act where Debtor claimed the local homestead exemption pursuant to 31 P.R.L.A. §§385(a); 1851-1857, as amended by Public Law 195 of September 13, 2011. The notary attorney who filed the notary act has already corrected the notified defect and the same is reflected in the Bayamon Property Registry records. Please refer to the attached document.
3. The Trustee also objected to the exemptions taken for personal property. The Trustee's objection to the exemptions of personal property disclosed on Schedule B is moot because because the exemptions were amended on Docket #51 .

WHEREFORE we pray from this Honorable Court to grant this motion and to deny Trustee's Objection to Debtor's Claim of Exemptions filed at Docket #50.

RESPECTFULLY SUBMITTED.

In Carolina, Puerto Rico, May 02, 2013.



I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to the all parties in interest, to their address of record.

LEGAL PARTNERS, P.S.C.

Box 316, Señorial Station
San Juan, P.R. 00926-6023
Tel:(787) 791-1818
Fax: (787) 791-4260

/s/ Manuel Casellas

Manuel Casellas
USDCPR 229012
mcasellas@legalpartnerspr.com



Registro de Propiedad

Búsqueda

Detalle:

Presentado por Persona: Asiento 521 **Diario** 1301: WILFREDO MOJICA presenta a las ocho horas y veinte minutos el uno de Agosto del año dos mil doce, escritura **67**, sobre Acta para Anotar Hogar Seguro, otorgada en Bayamon el día veintiuno de Junio del año dos mil doce ante el notario DON MIGUEL ANGEL CANALS CANALS, para que se inscriba a favor de JUAN AVELINO SILVA SERRANO sobre la finca número 20367 del termino municipal de Bayamon, Solar 26-N de Villa contesa con cabida de 336.38 mc. Con un valor la transacción de \$ **VALOR**. **Derechos:** \$ Exento **Presentación y Código Político \$10.50.**

Notas:

Fecha	Nota
30-04-2013	Suspendido el término de caducidad de 60 días, por haberse corregido las faltas señaladas en la Carta de Notificación. Hoja del legajo número 300. Bayamón a 30 de Abril de 2.013.
08-03-2013	Notificado hoy por los fundamentos incluidos en la notificación legajada bajo el número 399. Bayamón a 8 de Marzo de 2.013.JFC
21-02-2013	Notificación Ver Detalle

Cerrar

31

Copyright © 2012 Departamento de Justicia de Puerto Rico • Calle Olimpo, Esq. Axtmayer, Pda. 11 Miramar, San Juan